

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DONALD ROBERTS #878021,

Plaintiff,

v

MICHIGAN DEPARTMENT OF
CORRECTIONS (MDOC), *et al.*,

Defendants.

NO. 1:23-cv-927

HON. JANE M. BECKERING

MAG. JUDGE SALLY J. BERENS

Donald Roberts #878021
In Pro Per
Alger Correctional Facility
N6141 Industrial Park Drive
Munising, MI 49862

Daniel P. Webber (P56740)
Mark J. Zausmer (P31721)
Attorneys for Def. Kelly
Zausmer August & Caldwell
32255 Northwestern Hwy., Ste. 225
Farmington Hills, MI 48334
dwebber@zausmer.com
mzausmer@zausmer.com

John L. Thurber (P44989)
Assistant Attorney General
Attorney for MDOC Defs. Quezada,
Rubley & Serritos
Mich. Dept. of Attorney General
Corrections Division
P.O. Box 30217
Lansing, MI 48909
(517) 335-3055
thurberj@michigan.gov

**MDOC DEFENDANTS' MOTION IN LIMINE TO
PRECLUDE TESTIMONY BY THE PLAINTIFF**

MDOC Defendants, Jeremy Quezada, Ray Rubley, and Derek Serritos,
through the undersigned counsel, bring this motion in limine to preclude testimony
by the Plaintiff, Donald Roberts, based on the grounds set forth in the
accompanying brief.

Respectfully submitted,

/s/ John L. Thurber
John L. Thurber (P44989)

Assistant Attorney General
Mich. Dept. of Attorney General
Attorney for MDOC Defs. Quezada,
Rubley & Serritos
Corrections Division
P.O. Box 30217
Lansing, MI 48909
(517) 335-3055
thurberj@michigan.gov

Dated: March 21, 2024

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2024, I electronically filed the above documents with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record and placed in the U.S. Postal Service a copy of the above document to non-ECF participant:

Donald Roberts #878021
Alger Correctional Facility
N6141 Industrial Park Drive
Munising, MI 49862

/s/ John L. Thurber
John L. Thurber (P44989)
Assistant Attorney General
Attorney for MDOC Defs. Quezada,
Rubley & Serritos